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7 Attorneys for Defendant
GRASS VALLEY USA, LLC

8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 TECHNOLOGY LICENSING
13 CORPORATION,

14 Plaintiff,

15 v.

16 GRASS VALLEY USA, LLC,

17 Defendant.

Case No.: 3:12-cv-06060-MEJ

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT AND
RESET INITIAL CASE DEADLINES**

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20 Pursuant to Local Rules 6-1(b) and 6-2(a), and subject to the Court's approval, Defendant
21 Grass Valley USA, LLC ("Grass Valley") and Plaintiff Technology Licensing Corporation
22 ("TLC"), by and through their respective counsel of record, hereby stipulate as follows:

23 WHEREAS, TLC served its Complaint for Patent Infringement (the "Complaint") on
24 December 3, 2012;

25 WHEREAS, the Court issued its Order Setting Initial Case Management Conference and
26 ADR Deadlines on November 29, 2012 (the "Scheduling Order");
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1 WHEREAS, Grass Valley currently has until December 24, 2012 to answer or otherwise
 2 respond to TLC's Complaint (Declaration of Vicki S. Veenker (the "Veenker Declaration"), filed
 3 concurrently herewith, at ¶2);

4 WHEREAS, the parties have stipulated, pending approval of the Court, to an additional
 5 **60 days** for Grass Valley to answer or respond to TLC's Complaint, enlarging the time for
 6 response up to and including February 22, 2013 (Veenker Declaration, at ¶4); and

7 WHEREAS, because a 60-day extension would cause Grass Valley's response to be due
 8 six days before the Initial Case Management Conference and after all other deadlines in the
 9 Court's Scheduling Order, the parties have further stipulated to a **29-day** extension of time of the
 10 deadlines set by the Court's Scheduling Order (Veenker Declaration, at ¶5).

11 NOW, THEREFORE, the parties, by and through their respective counsel, stipulate as
 12 follows:

- 13 1. Grass Valley's time to answer or otherwise respond to TLC's Complaint shall be
 14 extended 60 days to February 22, 2013.
- 15 2. The parties' last day to meet and confer regarding initial disclosures, early settlement,
 16 ADR process, and discovery plan; to file ADR certification; and to file either
 17 Stipulation to ADR Process or Notice of Need for ADR Phone Conference shall be
 18 extended 29 days to Friday, March 8, 2013.
- 19 3. The parties' last day to file the Rule 26(f) Report, complete initial disclosures or state
 20 objections in that Rule 26(f) Report and file a Case Management Statement per the
 21 Court's Standing Order re Contents of Joint Case Management Statements shall be
 22 extended 29 days to Friday, March 22, 2013.
- 23 4. The Initial Case Management Conference shall be rescheduled by the Court to a date
 24 on or after Friday, March 29, 2013.

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1 Dated: December 19, 2012

SHEARMAN & STERLING LLP

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3 By: /s/ Vicki Veenker

4 Vicki S. Veenker
5 Joshua C. Walsh-Benson
6 Benjamin Petersen

7 Attorneys for Defendant
8 GRASS VALLEY USA, LLC

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10 NIRO, HALLER & NIRO

11
12 By: /s/ Martin Fineman

13 Martin L. Fineman
14 Raymond P. Niro
15 Joseph N. Hosteny
16 Arthur A. Gasey

17 Attorneys for Plaintiff
18 TECHNOLOGY LICENSING
19 CORPORATION

20 **ORDER**

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 Dated: December 20, 2012


23 The Honorable Maria-Elena James
24 United States Magistrate Judge

GENERAL ORDER 45 X.B. – ATTESTATION

I, Vicki Veenker, am the ECF User whose ID and password are being used to file this STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT. In compliance with General Order 45, X.B., I hereby attest that other counsel whose e-signature appears on the foregoing signature page has concurred with this filing.

Dated: December 19, 2012

/s/ Vicki Veenker
Vicki Veenker